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7

8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$1,167,233.00 IN  
U.S. CURRENCY,

15 Defendant.  
16

CASE NO.

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America, potential claimant Sharon  
18 Mann ("Mann" or "claimant"), by and through their respective counsel, and potential claimant, Jairi Carter  
19 ("Carter" or "claimant"), appearing *in propria persona*, as follows:

20 1. On or about February 7, 2023, claimant Sharon Mann filed a claim in the administrative  
21 forfeiture proceedings with the U.S. Customs and Border Protection with respect to the Approximately  
22 \$1,167,233.00 in U.S. Currency (hereafter "defendant currency"), which was seized on December 13, 2022.

23 2. On or about March 15, 2023, claimant Jairi Carter filed a claim in the administrative  
24 forfeiture proceedings with the U.S. Customs and Border Protection with respect to the Approximately  
25 \$1,167,233.00 in U.S. Currency (hereafter "defendant currency"), which was seized on December 13, 2022.

26 3. The U.S. Customs and Border Protection has sent the written notice of intent to forfeit  
27 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person  
28 to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the

1 claimants have filed a claim to the defendant currency as required by law in the administrative forfeiture  
2 proceeding.

3 4. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
4 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency  
5 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
6 proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.  
7 That deadline is May 8, 2023.

8 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
9 to July 7, 2023, the time in which the United States is required to file a civil complaint for forfeiture  
10 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
11 subject to forfeiture.

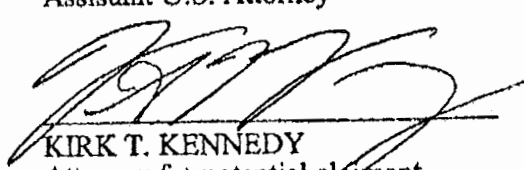
12 6. Accordingly, the parties agree that the deadline by which the United States shall be required  
13 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that  
14 the defendant currency is subject to forfeiture shall be extended to July 7, 2023.

15 Dated: May 5, 2023

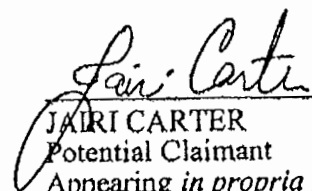
PHILLIP A. TALBERT  
United States Attorney

17 /s/ Alyson A. Berg  
18 ALYSON A. BERG  
Assistant U.S. Attorney

20 Dated: May 5, 2023

19   
21 KIRK T. KENNEDY  
Attorney for potential claimant  
Sharon Mann

23 Dated: May 5, 2023

22   
24 JARI CARTER  
Potential Claimant  
25 Appearing in propria persona

26 IT IS SO ORDERED.

27 Dated: 5, \_\_\_\_\_

28 \_\_\_\_\_  
UNITED STATES DISTRICT JUDGE